

ELIZABETH A. NACE

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1 Q. Did you ever use the Sellersville Belles as
2 an opportunity to get together after a practice or
3 after a game with Mr. Romig?

4 A. No.

5 Q. And the Sellersville Belles, that continued
6 up until the time of his arrest, his coaching,
7 correct?

8 A. Yes.

9 Q. Do you know how many times you had sex
10 while he was coaching the Sellersville Belles?

11 A. From what I remember, it was only a couple
12 of times, like two or --

13 Q. The other times would have occurred before
14 then?

15 A. Yes.

16 Q. And all those times were at his home?

17 A. Most of them.

18 Q. Where were the other ones?

19 A. There were some at my house.

20 Q. I think you stated that you self-diagnosed
21 concerning the anorexia, correct?

22 A. Yes.

23 Q. Never received any treatment before this
24 sexual encounter with Mr. Romig, never received any

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1 treatment after it, correct?

2 A. No. Yes, that's correct.

3 Q. My understanding is that you indicated that
4 you were a member of the National Honor Society
5 both your junior and senior year, right?

6 A. Yes.

7 Q. As part of the National Honor Society, you
8 had to complete a student activity information form
9 and submit that to Pennridge?

10 A. Yes.

11 Q. What were some of the activities you recall
12 submitting on that form that would have been
13 submitted when you were a sophomore I suppose,
14 right?

15 A. Yes.

16 Q. What were some of the activities you
17 submitted on that form?

18 A. From what I remember, I think I put
19 softball down as one of them on my travel team and
20 then --

21 Q. That was the Deep Run team?

22 A. Yes.

23 Q. Is that the Deep Run team that was coached
24 by Mr. Geary?

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1 A. Yes, he was one of the coaches.
2 Q. How long did Mr. Geary coach you?
3 A. I believe it was only like two years.
4 Q. But that would have been say ninth and
5 tenth grade?
6 A. Yes.
7 Q. So you put down softball. What other
8 activities did you put down?
9 A. I think I put down Girl Scouts and church.
10 Q. What church are you a member of? Are you a
11 member of a church?
12 A. Yes.
13 Q. What is the name of that?
14 A. St. Michael's Lutheran.
15 Q. In Perkasio?
16 A. In Sellersville.
17 Q. And are you member of their youth group?
18 A. Yes.
19 Q. I think it came up about counseling, and I
20 may bounce around here a little bit. I apologize.
21 My understanding is you never went to -- didn't
22 take up the offer of Ms. Moffet at Pennridge to go
23 to counseling at the high school, correct?
24 A. Yes.

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1 Q. Did you get any counseling through your
2 church?

3 A. No.

4 Q. Was counseling available through your
5 church?

6 A. Yes.

7 Q. Why didn't you get counseling through Ms.
8 Moffet at Pennridge?

9 A. I didn't really want to. Like when it
10 first started, I didn't want to talk about it, and
11 I never wanted to go to a counselor. My parents
12 were the ones who wanted me to.

13 Q. And how about no counseling through your
14 church, why not?

15 A. Again, I didn't really want to talk about
16 it.

17 Q. At your church, do they have a teen pastor
18 there?

19 A. No. It's just a pastor who is the pastor.

20 Q. Just one pastor?

21 A. Yes.

22 Q. Did you also go to the First Baptist Church
23 in Perkasio?

24 A. I attended there with my friends a little

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1 bit.

2 Q. Was that in their youth group?

3 A. Yes.

4 Q. Did they have a youth pastor there as well?

5 A. Yes.

6 Q. Did you seek out any counseling with that
7 youth pastor?

8 A. No.

9 Q. Did Eric Romig ever state to you that he
10 had a sexual relationship with any other student?

11 A. No.

12 Q. He never indicated that to you?

13 A. No.

14 Q. Yes, he never indicated that?

15 A. Yes.

16 Q. Just as I'm looking at this, would it be
17 fair to characterize that the majority of the
18 sexting that -- the texting and the sexting that
19 occurred, that occurred during the summer between
20 your sophomore and junior year?

21 A. Yes.

22 Q. How would you describe your relationship
23 between you and your mom during the 2012/2013
24 summer?

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1 A. It was good.
2 Q. 2014 summer?
3 A. It was good.
4 Q. How about your dad?
5 A. It was good.
6 Q. Has your relationship with your mom gotten
7 better or worse since this incident came to light?
8 A. Better.
9 Q. How about your dad? Has that gotten better
10 or worse?
11 A. Better.
12 Q. It's my understanding that you had -- and
13 you've indicated that you had to lie to your
14 parents in order to continue to have a sexual
15 relationship with Eric Romig, is that right?
16 A. Yes.
17 Q. And did you also have to lie to your
18 friends?
19 A. Not really, no.
20 Q. Just your parents?
21 A. Yes.
22 Q. Do you still lie about anything now
23 relative to the relationship if you're asked about
24 it? You talked about being embarrassed perhaps.

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1 Do you still lie about it now if somebody asks or
2 you will just tell them?

3 A. No one besides my parents really ask me
4 about it.

5 Q. The one thing is, when this lawsuit was
6 filed, it did make some press and your parents'
7 names were indicated in the paperwork that was
8 filed. Obviously, your initials were indicated.
9 Somebody can put two and two together. You
10 indicated there was some press associated with this
11 lawsuit, is that correct?

12 A. A little, yes.

13 Q. Is that -- isn't it true that, when your
14 father would go watch your games, the reason he
15 would sit apart was because of the tension that
16 developed as a result of the filing of this lawsuit
17 on the team?

18 A. I do not know.

19 Q. Now, your Complaint alleges certain
20 elements that you've suffered as a result of this
21 inappropriate sexual relationship. Talks about
22 severe and ongoing physical damage. What severe
23 and ongoing physical damage have you sustained?

24 A. Again, like the sleepless nights. Like I

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1 still sometimes have the times when I have to think
2 about it, and sometimes when I don't want to do
3 anything or just want to stay at home and just the
4 nightmares that occurred like right after for a
5 couple of months.

6 Q. And I understand there was a couple months'
7 period where that was more intense than it is now,
8 is that right?

9 A. Yes.

10 Q. Did you ever receive any medications to
11 help you with your sleeplessness?

12 A. No.

13 Q. Did you ever receive any medication to help
14 you with your lethargy?

15 A. No.

16 Q. Any medication for your dermatological
17 condition?

18 A. No.

19 Q. Did you treat with a dermatologist before
20 this sexual relationship with Mr. Romig?

21 A. No.

22 Q. Did you treat with a dermatologist after
23 the sexual relationship with Mr. Romig?

24 A. No.

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1 Q. Did you ever treat with a medical doctor as
2 a result of any harm that you sustained or you're
3 alleging that you sustained in this inappropriate
4 sexual relationship?

5 A. No.

6 Q. You also allege severe and ongoing
7 psychological damage. To my understanding in
8 looking through the records that we've been
9 provided by your counsel, you treated twelve times
10 with Nova and two times with Insight, is that
11 right?

12 A. Yes.

13 Q. So fourteen times total?

14 A. Yes.

15 Q. Have you received any other treatment other
16 than those fourteen times?

17 A. No.

18 Q. In your treatment that you went through
19 with Insight, and this was on the first visit, they
20 do kind of an evaluation of your circumstances.
21 And they said that you were well-groomed, that your
22 speech was normal, motor skills were normal, your
23 mood was good. Would you agree with that
24 assessment at that time? Is that an accurate

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1 assessment?

2 A. Yes.

3 Q. It also said your thought processes were
4 goal oriented, your affect was appropriate, that
5 you had no hallucinations, no delusions?

6 A. Yes.

7 Q. Also indicated that you were not suicidal
8 and you had no homicidal ideation?

9 A. Yes.

10 Q. And in the evaluation it also said that you
11 had no insomnia and no anxiety at this time. This
12 was done on -- this evaluation was completed on
13 5/22/14. So at this time you were not suffering
14 from any insomnia or any anxiety, would that be
15 accurate?

16 A. Yes.

17 Q. In your -- the initial disclosure filed by
18 your attorney with the court, it says that you lost
19 life's pleasures. Do you know what part of life's
20 pleasures that you've lost as a result of this
21 inappropriate relationship with Eric Romig?

22 A. Well, in the beginning for a couple of
23 months, like, I didn't want to go back to the
24 normal things and like my normal life basically,

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1 and I didn't want to do those things anymore for a
2 while.

3 Q. Was that just for that first couple of
4 months after the arrest occurred?

5 A. Yes.

6 Q. Also says you were suffering from
7 depression. Have you treated with anyone for
8 depression?

9 A. No.

10 Q. Did you ever treat with anyone before the
11 sexual relationship with Mr. Romig for depression?

12 A. No.

13 Q. Ever treat with anyone after the sexual
14 relationship with Mr. Romig?

15 A. No.

16 Q. Also mentioned anxiety and fear. Did you
17 treat with anyone regarding anxiety and fear other
18 than those fourteen visits with the therapists?

19 A. No.

20 Q. Also mentioned in the filing that you
21 experienced loss of self-worth and esteem. Have
22 you sensed a loss of self-worth and self-esteem?

23 A. Like, yes, until the end of my junior year.

24 Q. Also mentioned that you've suffered

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1 embarrassment. Can you explain that?

2 A. Again, walking through the school hallways
3 it was hard for me because I thought other people
4 were looking at me differently or judging me.

5 Q. Since the filing of this lawsuit, which
6 occurred in January of this year, has your anxiety
7 increased at all?

8 A. No.

9 Q. Has your embarrassment increased at all?

10 A. No.

11 Q. Has your insomnia increased at all?

12 A. No.

13 Q. Because this claim involves emotional
14 distress, and I have to ask some of these
15 questions, and I apologize if they seem out of
16 balance as they would be in any other context, but
17 were you affected at all from an anxiety standpoint
18 or an emotional standpoint when you learned that
19 your attorney, Louis Hornstine, is also
20 representing a Bucks County teacher who's accused
21 of similar incident involving a student?

22 A. No.

23 MR. GROTH: Object to the form of
24 the question. You can answer.

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1 THE WITNESS: No.

2 BY MR. RUSSELL:

3 Q. Do you have any fears or anxieties that the
4 information that is being gained in your case will
5 be used to help a Bucks County teacher in another
6 case?

7 A. No.

8 Q. I think you indicated that this incident
9 didn't affect in any way your college selection?

10 A. Yes.

11 Q. You also got two scholarships, correct?

12 A. Yes.

13 Q. You finished your school year on the
14 distinguished honor roll?

15 A. Yes.

16 Q. Or your school career, I should say,
17 correct?

18 A. Yes.

19 Q. Sports, you had mentioned that your
20 softball team didn't do as well the next year, I
21 think, or something like that. That personally you
22 did get better every year you played, correct?

23 A. Yes.

24 Q. So this involvement with Mr. Romig had no

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1 adverse effect on your ability to continue to
2 improve playing softball?

3 A. No.

4 Q. It did not have any effect?

5 A. Yes.

6 MR. RUSSELL: No further questions
7 at this time. Thank you.

8 MR. KEMETHER: One real quick.

9 MR. GROTH: Let me ask a couple.

10 MR. KEMETHER: Sorry about that.

11 MR. GROTH: That's okay.

12 BY MR. GROTH:

13 Q. Miss Nace, Mr. Russell read to you off a
14 checklist of items from Ms. Trishelle's counseling
15 notes of you. He said there were checkmarks for
16 insomnia, marked diminished interest in pleasure in
17 all or most of daily activities, but he omitted a
18 couple of things that were checked off by Ms.
19 Trishelle. First of all, have you ever seen this
20 document before? It's attached to my -- to
21 Plaintiff's initial disclosures, and it's the
22 Insight counseling records?

23 A. Yes.

24 Q. Okay. And there is a category which Mr.

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1 Russell did not mention that says feeling of
2 worthlessness or excessive or inappropriate guilt
3 nearly every day, not nearly self-reproach or guilt
4 about being sick. What's the checkmark for that?

5 Yes or no?

6 A. Yes.

7 Q. Did you have discussions about that with
8 Ms. Trishelle?

9 A. Yes.

10 Q. Did you tell her that you had feelings of
11 worthlessness or excessive or inappropriate guilt
12 about the Romig relationship situation?

13 A. Yes.

14 Q. Okay. There's another category right under
15 that that says diminished ability to think or
16 concentrate or indecisiveness nearly every day,
17 which Mr. Russell omitted to refer to you. What's
18 the box checked there? Yes or no?

19 A. Yes.

20 Q. What did you discuss with Ms. Trishelle
21 about your diminished ability to think or
22 concentrate or indecisiveness nearly every day?

23 A. We discussed how hard it was for me to
24 focus. I was not able to concentrate more in

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1 school and more on problems that I would have that
2 would arise.

3 MR. GROTH: Thanks. No other
4 questions.

5 BY MR. KEMETHER:

6 Q. That treatment was six months to a year
7 after the arrest happened?

8 A. Yes.

9 Q. Had those issues largely resolved by then?

10 MR. GROTH: I'll object to the form
11 of the question only insofar as it may
12 delve into expert testimony, but go ahead
13 and answer.

14 BY MR. KEMETHER:

15 Q. Had the issues you were complaining of
16 largely resolved by then, the concentration and so
17 forth?

18 A. The concentration, it was still hard for me
19 to focus sometimes, like some days were worse than
20 others, but for the most part, I was getting back
21 to normal, but I was not fully my normal self.

22 Q. Okay. And I think you mentioned that you
23 went there because your parents asked you to?

24 A. Yes.

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1 Q. You understand that you are a plaintiff in
2 this lawsuit?

3 A. Yes.

4 Q. You understand that what you are doing is
5 you're seeking money compensation from the
6 defendants here?

7 A. Yes.

8 Q. Did your parents ask your permission to
9 pursue this lawsuit?

10 A. Yes.

11 Q. Did you give it?

12 A. Yes.

13 MR. KEMETHER: Thank you. No
14 further questions.

15 BY MR. SANTARONE?

16 Q. Just a couple. Trishelle, why did you stop
17 going to see her after only two visits?

18 A. She basically discharged me. She said I
19 was getting better, and there was no really other
20 reason to go back.

21 Q. And did she tell you that at the time of
22 the second visit then?

23 A. Yes.

24 Q. Alli Wedman, when you told her about that

ELIZABETH A. NACE

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1 you are the person, had she come to you? Did she
2 have any suspicion that you were the person?

3 A. No.

4 Q. She didn't say, hey, you are acting
5 different or there's something going on?

6 A. No.

7 Q. The counseling sessions that you had in
8 either the twelve or the two, were any of them
9 family counseling sessions?

10 A. No.

11 Q. Have you ever had any family counseling
12 sessions?

13 A. No.

14 Q. Have you discussed what happened with your
15 older sister?

16 A. No.

17 MR. SANTARONE: That's all have

18 Thank you.

19 MS. CONNOR: No questions.

20 BY MR. COX:

21 Q. Just a couple more. When you testified in
22 response to a question from Mr. Russell that you
23 believed the texts from Mr. Romig became sexual
24 sometime in June of 2013, do you recall whether you

ELIZABETH A. NACE

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1 were still playing JV softball at the time they
2 became sexual in nature in June of 2013?

3 A. No, I don't believe so.

4 Q. Okay. There was a banquet at the end of
5 that softball season. You told me about the one in
6 the spring of 2012. Was there a banquet in the
7 spring of 2013?

8 A. Yes.

9 Q. Did Mr. Romig attend that banquet?

10 A. Yes.

11 Q. Did your folks go with you to that banquet?

12 A. Yes.

13 Q. Do you remember when that was in 2013, the
14 banquet?

15 A. I believe, it was in June.

16 Q. And at the time that you went to that
17 banquet, had your relationship with Mr. Romig
18 become sexual in nature?

19 A. No.

20 Q. Had the texts become sexual in nature at
21 that time?

22 A. I don't remember.

23 Q. Do you remember your parents having any
24 interaction with Mr. Romig at this banquet?

ELIZABETH A. NACE

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1 A. I do not know.

2 MR. COX: That's all I have.

3 Thank you.

4 MR. RUSSELL: Nothing further.

5 BY MR. GROTH:

6 Q. Couple more questions about the issue about
7 the texts from Mr. Romig becoming personal in
8 nature to you, not having anything to do with
9 softball, I think, your testimony was that happened
10 sometime in late April or May, correct?

11 A. Yes.

12 Q. During the softball season, correct?

13 A. Yes.

14 Q. During that time, when those texts
15 according to your testimony you think were being
16 used to gain your trust of him and you are talking
17 about things outside of softball, was he making
18 comments in the texts or writing anything in the
19 text about your body?

20 A. Yes, he would comment on my body and how I
21 looked.

22 Q. Did he comment about your attractiveness?

23 A. Yes.

24 Q. Did he say in the texts that he found you

ELIZABETH A. NACE

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1 attractive?

2 A. Yes.

3 Q. And this is before the end of the school
4 year?

5 A. Yes.

6 Q. And was this also at a time when he was
7 coaching you?

8 A. I believe so, yes.

9 Q. Did he also tell you in these texts before
10 the end of the school year while he was coaching
11 you that he realized you might have some kind of
12 eating disorder, that he would be able to help you
13 with that?

14 A. Yes.

15 Q. Did any of those topics have anything to do
16 with softball?

17 A. No.

18 MR. GROTH: No other questions.

19 Thank you.

20 MR. KEMETHER: Nothing further.

21 (Witness excused.)

22 (Deposition concluded at 1:30 p.m.)

23

24

ELIZABETH A. NACE

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C E R T I F I C A T I O N

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I, LISA PETITTA, Certified

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Shorthand Reporter and Registered Professional

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Reporter, do hereby certify that the foregoing is a

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true and accurate transcript of the stenographic

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notes taken by me in the aforementioned matter.

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DATE:



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JUL 22 2015

Lisa Petitta, CSR, RPR

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ELECTRONIC REPORTING STENOGRAPHIC AFFILIATES

ELIZABETH A. NACE

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1 INSTRUCTIONS TO WITNESS

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Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

ELIZABETH A. NACE

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ACKNOWLEDGMENT OF DEPONENT

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I, _____, do

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hereby certify that I have read the

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foregoing pages, and that the same is a

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correct transcription of the answers given

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by me to the questions therein propounded,

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except for the corrections or changes in

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form or substance, if any, noted in the

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attached Errata Sheet.

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DATE

SIGNATURE

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16

Subscribed and sworn to before me.

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My commission expires _____

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Notary Public

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ORAL DEPOSITION OF EMILY MAYER, 8/28/2015

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CIVIL TRIAL DIVISION

JAMES NACE, et al CIVIL ACTION

vs.

PENNRIDGE SCHOOL DISTRICT,
et al. NO. 15-333

Friday, August 28, 2015

Oral deposition of EMILY MAYER, held at the
offices of HORNSTINE PELLONI & HORNSTINE, 1500 Walnut
Street, Suite 300, Philadelphia, Pennsylvania,
beginning at 10:00 a.m., on the above date, before
LANCE A. BRUSILOW, Registered Professional Reporter,
Approved Reporter for the United States District Court,
and Notary Public, there being present.

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EXAMINATION INDEX

WITNESS: EMILY MAYER

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By Mr. Kemether (page-105, 214)

By Mr. Santarone (page-146)

By Ms. Connor (page-162)

By Mr. Russell (page-166)

EXHIBIT INDEX

Exhibit-1 Letter dated April 10, 2015
from D. Groth to E. Mayer (page-19)

Exhibit-2 ***Not Marked***

Exhibit-3 Email dated January 16, 2010
from A. Smith to R. Clymer (page-201)

Exhibit-4 Complaint (page-204)

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<p>1 (It is hereby agreed by and 2 among counsel that sealing, certification 3 and filing are waived; and that all 4 objections, except as to the form of the 5 question, are reserved until the time of 6 trial) 7 EMILY MAYER, having been first 8 duly sworn, was examined and testified as 9 follows: 10 EXAMINATION 11 BY MR. GROTH: 12 Q. Good morning. Would you state 13 your full name for the record, please? 14 A. Emily Mayer. 15 Q. Would you keep your voice up, 16 please, so all the attorneys can hear 17 you? I know this is a small room, but 18 you have to speak loudly enough so that 19 everybody hears what you have to say. 20 My name is David Groth, and I 21 represent the plaintiff in a lawsuit 22 that's currently pending in the Federal 23 District Court for the Eastern District of 24 Pennsylvania, and I've asked you here</p>	<p>1 question and that the information you're 2 giving me going back to 2008 or so is 3 true and correct to the best of your 4 recollection. 5 Let me complete the question 6 before you give an answer, for two 7 reasons: Number one, so that you know 8 exactly what it is I'm asking you before 9 you start your answer; and number two, so 10 that the court reporter only has to take 11 down one of us speaking at a time. It's 12 hard to take notes of exactly what's 13 being said if the witness and the 14 attorney are speaking over each other. 15 You have to give a verbal 16 response to all questions -- a yes, no, 17 or some narrative explanation -- as 18 opposed to head-shake yes or a head-shake 19 no because the court reporter can only 20 make a transcript of what's said. So, 21 you have to verbalize all of your 22 answers. 23 You're required to answer all 24 the questions that you are asked fully</p>
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<p>1 today to testify about facts and issues 2 that I think are important to my client's 3 case. I'm going to ask you a series of 4 questions regarding events that go back as 5 far back as 2008/2009. 6 Have you ever given a 7 deposition before? 8 A. No, I have not. 9 Q. Let me just give you some 10 instructions which will help us get 11 through more quickly and more efficiently 12 in terms of the handling of the 13 deposition. 14 First of all, listen to my 15 questions carefully and make sure that you 16 understand the question before you begin 17 an answer. 18 If the question is not clear 19 to you, my question or any of the other 20 attorneys' questions, ask me to restate 21 it or rephrase it or clarify the question 22 and I'll be happy to do that. 23 If you answer a question, I 24 will assume that you understood the</p>	<p>1 and to the best of your ability. 2 There may be objections to 3 questions that I ask you by the other 4 attorneys or I may object to a question 5 that one of the other attorneys asks. 6 If that happens, if somebody 7 objects to a question, you're to allow 8 the objection to be stated for the record 9 and then you're going to proceed to 10 answer the question, anyway. That has to 11 do with some legal issues that you don't 12 have to be concerned about. 13 I'm going to ask you for facts 14 and information that you know personally 15 or may have heard or learned from others 16 or gotten through other sources. 17 So, it's not just what you 18 personally did or said or your interaction 19 with another person. If somebody told 20 you something about facts or information 21 that I'm asking you about, you're allowed 22 to tell us that. In another setting -- 23 at trial -- that would be hearsay and you 24 couldn't say what somebody else said to</p>

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<p>1 you, but that doesn't apply in this 2 situation, in an oral deposition before 3 trial.</p> <p>4 If you do not know the answer 5 to a question or do not recall the facts 6 or information I'm asking you about, tell 7 me that. That's a sufficient answer.</p> <p>8 I know that, again, some of 9 these events that we'll be talking about 10 go back six years or so and you may have 11 simply forgotten some of the information 12 you knew back then. And if that's the 13 case, just tell us that.</p> <p>14 I don't want you to guess or 15 speculate or assume anything in response 16 to a question. Don't think that just 17 because somebody asks you a question, that 18 you're expected to know the answer. If 19 you don't know the answer, you'll tell us 20 that.</p> <p>21 There may be information that 22 you knew at one time that you simply 23 can't recall now, and if that's the case, 24 you'll tell us that.</p>	<p>1 testimony under oath today is just the 2 same as if you were testifying under oath 3 at trial in front of a judge or jury?</p> <p>4 A. Yes.</p> <p>5 Q. Let me first have your current 6 residence address, please.</p> <p>7 A. [REDACTED] 8 [REDACTED]</p> <p>9 Q. And do you live there with 10 somebody?</p> <p>11 A. Yes, my husband.</p> <p>12 Q. And what's his name?</p> <p>13 A. Chase Brunner.</p> <p>14 Q. And when were you married?</p> <p>15 A. May 17th, 2015.</p> <p>16 Q. Is this the same Chase Brunner 17 who you were dating in high school at 18 Faith Christian Academy back in 2009?</p> <p>19 A. Yes.</p> <p>20 Q. Who were you living with in 21 2009?</p> <p>22 A. My parents.</p> <p>23 Q. Can I have their names, please?</p> <p>24 A. Kevin and Annette Smith.</p>
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<p>1 There may be information that 2 we ask you about that you never had, that 3 you never knew, and if that's the case, 4 it's not a question of recollection; it's 5 an issue of "I never had that information 6 in the first place" and you can tell us 7 that.</p> <p>8 Are you feeling okay today? Is 9 there any medical reason why you would 10 not be able to testify?</p> <p>11 A. No.</p> <p>12 Q. If you need a break for any 13 reason, bathroom break or any other 14 break -- you just want to get up and 15 walk around a little bit -- you're 16 certainly free to do that, and just ask 17 us for that and we'll be happy to give 18 you a break whenever you need it.</p> <p>19 Do you understand that you're 20 required to answer all of the questions 21 that you're asked truthfully and that 22 you've taken an oath and sworn to do so?</p> <p>23 A. Yes.</p> <p>24 Q. And do you understand that your</p>	<p>1 Q. And where were you living at 2 that time?</p> <p>3 A. With my parents.</p> <p>4 Q. I mean the address.</p> <p>5 A. Oh, sorry.</p> <p>6 Q. That's okay.</p> <p>7 A. [REDACTED] 8 [REDACTED]</p> <p>9 Q. And in the fall of 2009 how 10 old were you?</p> <p>11 A. Seventeen.</p> <p>12 Q. And where were you going to 13 school?</p> <p>14 A. Faith Christian Academy.</p> <p>15 Q. I might refer to them on 16 occasion as FCA instead of Faith Christian 17 Academy.</p> <p>18 A. Okay.</p> <p>19 Q. What grades did you attend at 20 FCA?</p> <p>21 A. Eleventh and twelfth.</p> <p>22 Q. Where did you go to school 23 prior to going to school at FCA?</p> <p>24 A. Upper Pekriomen.</p>

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<p>1 Q. And how long did you attend 2 there? 3 A. One year. 4 Q. Was that tenth grade? 5 A. Correct. 6 Q. Why did you leave Upper 7 Pekriomen? 8 A. Wasn't able play sports there. 9 Wasn't really-choosing the right friends,----- 10 so... 11 Q. How did you end up going to 12 FCA? 13 A. My parents heard about it 14 through friends, so... 15 Q. Had you played sports before 16 going to Upper Pekriomen? 17 A. Yes. 18 Q. Where was that? 19 A. Calvary Baptist in Lansdale. 20 Q. And what grades did you go to 21 at Calvary Baptist? 22 A. Fourth to ninth. 23 Q. What sports did you play? 24 A. Volleyball, basketball and</p>	<p>1 college? 2 A. My first year I went to Montco, 3 and after that I went to Cairn University 4 and graduated there. 5 Q. Did you play sports there? 6 A. I did: I played volleyball. 7 Q. Not basketball? 8 A. No. 9 Q. And Montgomery County Community 10 College, you went there for one year? 11 A. I did. 12 Q. Did you get a degree at Cairn? 13 A. I did: I graduated with a 14 business administration degree. 15 Q. That's a four-year degree? 16 A. Correct. 17 Q. Do you have any other formal 18 education besides what we've already gone 19 over? 20 A. No. 21 Q. Let's talk about your employment 22 history starting in high school. Were 23 you employed in high school or during 24 high school, summer or part time,</p>
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<p>1 soccer. 2 Q. Why did you end up leaving 3 Faith Baptist to go to Upper Pekriomen? 4 A. I just was not -- I was kind 5 of an outsider and I didn't get along 6 with a lot of kids there, very cliquey, 7 so I asked my parents if I could leave 8 and they granted that. 9 Q. Where did you go to school 10 before Calvary Baptist? 11 A. Bridle Path. 12 Q. What is that? 13 A. Elementary school. 14 Q. Where is that located? 15 A. Montgomeryville. 16 Q. Did you go to college after 17 high school? 18 A. I did. 19 Q. What year did you graduate high 20 school? 21 A. 2010. 22 Q. From FCA? 23 A. Correct. 24 Q. And where did you go to</p>	<p>1 whatever? 2 A. Yes. 3 Q. Doing what? 4 A. I was a waitress at a small 5 cafe in Pennsburg, and I also worked at a 6 vet's office. 7 Q. Anyplace else in high school? 8 A. No. 9 Q. What about during your college 10 years? Did you work part time at all? 11 A. I did. I worked at Chantilly 12 Floral Boutique in Lansdale. 13 Q. Doing what? 14 A. I was a sales associate. 15 Q. Anywhere else? 16 A. I worked at American Eagle for 17 a short time my second year of college, I 18 believe. 19 Q. Anything else? 20 A. I had work-study at the 21 university, but... 22 Q. What about after you graduated? 23 Where did you work? 24 A. I remained at the university</p>

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<p>1 doing a presidential internship in the</p> <p>2 campus store, managing it, and in July</p> <p>3 they hired me full time to continue to</p> <p>4 manage the store.</p> <p>5 Q. Is this like the bookstore</p> <p>6 or...</p> <p>7 A. Yes.</p> <p>8 Q. And what year did you graduate</p> <p>9 from Cairn?</p> <p>10 A. 2014.</p> <p>11 Q. Is your husband employed?</p> <p>12 A. Yes.</p> <p>13 Q. Where does he work?</p> <p>14 A. Modern Male Barber Shop in</p> <p>15 Sellersville.</p> <p>16 Q. What sports did you play while</p> <p>17 you were at FCA?</p> <p>18 A. My eleventh-grade year I played</p> <p>19 volleyball, basketball and soccer, and my</p> <p>20 senior year I only played volleyball and</p> <p>21 basketball.</p> <p>22 Q. Who was your basketball coach</p> <p>23 during your junior and senior years at</p> <p>24 FCA?</p>	<p>1 shortly after April 10th, 2015?</p> <p>2 A. Yes.</p> <p>3 Q. And after receiving this letter,</p> <p>4 did you and your parents agree to meet</p> <p>5 with me and talk about the issues that I</p> <p>6 raised in that letter?</p> <p>7 A. Yes.</p> <p>8 Q. And did I come to your home</p> <p>9 and meet with you and your father and</p> <p>10 your mother and sit down and talk about</p> <p>11 basically your time at FCA during your</p> <p>12 junior and senior year there?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Let me ask you about</p> <p>15 your junior year first. That was the</p> <p>16 first year that Mr. Romig coached you at</p> <p>17 FCA, correct?</p> <p>18 A. Yes.</p> <p>19 Q. During that year, during that</p> <p>20 season -- when does the basketball season</p> <p>21 run, or when did it run back then?</p> <p>22 A. I believe pre-season started</p> <p>23 November and went to March.</p> <p>24 Q. That would have been November</p>
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<p>1 A. Eric Romig.</p> <p>2 Q. Did you know him before he</p> <p>3 became your basketball coach?</p> <p>4 A. No.</p> <p>5 (Exhibit Mayer-1 was marked for</p> <p>6 identification)</p> <p>7 BY MR. GROTH:</p> <p>8 Q. Ms. Mayer, I'm going to show</p> <p>9 you a document which is marked Mayer</p> <p>10 exhibit one and ask you if you've ever</p> <p>11 seen that document before.</p> <p>12 A. Yes.</p> <p>13 Q. That's a letter from me to you</p> <p>14 dated April 10th, 2015. Is that correct?</p> <p>15 A. Yes.</p> <p>16 MR. GROTH: And for the rest</p> <p>17 of the attorneys, this is pretty much the</p> <p>18 same letter that Mr. Russell attached to</p> <p>19 his letter to the court after our first</p> <p>20 meeting, the same letter I sent to other</p> <p>21 independent witnesses, like Ms.</p> <p>22 Alderfer.</p> <p>23 BY MR. GROTH:</p> <p>24 Q. Did you receive this letter</p>	<p>1 of 2008 to March of 2009?</p> <p>2 A. Correct.</p> <p>3 Q. During that basketball season</p> <p>4 did you ever receive any texts from Eric</p> <p>5 Romig?</p> <p>6 A. Yes.</p> <p>7 Q. What was the subject matter of</p> <p>8 the texts?</p> <p>9 A. Mainly that year it was just</p> <p>10 mass texts will go out to the whole team.</p> <p>11 Q. About what? What types of</p> <p>12 issues?</p> <p>13 A. Practices, games.</p> <p>14 Q. That year did you receive any</p> <p>15 texts from Mr. Romig of a personal</p> <p>16 nature? And when I use that term,</p> <p>17 "personal nature," I'm talking about</p> <p>18 anything that wasn't related to basketball</p> <p>19 activities.</p> <p>20 A. I do not believe so.</p> <p>21 Q. Did you have any particular</p> <p>22 problems with Mr. Romig acting as your</p> <p>23 basketball coach for that junior-year</p> <p>24 season?</p>

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<p>1 A. No.</p> <p>2 Q. Did you get along with him</p> <p>3 okay?</p> <p>4 A. Yes.</p> <p>5 Q. During your junior season was</p> <p>6 Chelsea Romig on the basketball team?</p> <p>7 A. Yes.</p> <p>8 Q. That's his, I believe, adopted</p> <p>9 daughter, Mr. Romig's adopted daughter?...</p> <p>10 A. Yes.</p> <p>11 Q. Did you become friendly with</p> <p>12 her?</p> <p>13 A. Yes.</p> <p>14 Q. How would you characterize your</p> <p>15 friendship?</p> <p>16 A. Very close friends.</p> <p>17 Q. Was she your best friend or one</p> <p>18 of your best friends or --</p> <p>19 A. Yes, best friend.</p> <p>20 Q. Did you do things out of school</p> <p>21 together?</p> <p>22 A. Yes.</p> <p>23 Q. What types of things?</p> <p>24 A. Just hang out, shop, go to each</p>	<p>1 Chelsea Romig start when you started</p> <p>2 playing basketball at FCA in November of</p> <p>3 2008?</p> <p>4 A. It was before.</p> <p>5 Q. You knew her before basketball,</p> <p>6 even?</p> <p>7 A. Just from attending the school</p> <p>8 in the beginning of that year.</p> <p>9 Q. She was in your classes?.....</p> <p>10 A. She was a year younger.</p> <p>11 Q. How did you know her before</p> <p>12 basketball?</p> <p>13 A. Hallways. She may have played</p> <p>14 volleyball, but to be honest, I don't</p> <p>15 remember.</p> <p>16 Q. When is the volleyball season?</p> <p>17 A. August or September to the</p> <p>18 beginning of November.</p> <p>19 Q. Beginning of basketball.</p> <p>20 A. Uh-huh.</p> <p>21 Q. Okay. Did Chelsea Romig ever</p> <p>22 tell you that she was sexually abused as</p> <p>23 a child?</p> <p>24 A. Yes.</p>
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<p>1 other's houses.</p> <p>2 Q. Did you ever sleep overnight at</p> <p>3 Chelsea Romig's house?</p> <p>4 A. Yes.</p> <p>5 Q. On how many occasions,</p> <p>6 approximately?</p> <p>7 A. About two or three, maybe.</p> <p>8 Q. When you did that, was that you</p> <p>9 along with other girls and Chelsea Romig,</p> <p>10 or just you and she?</p> <p>11 A. There were other girls.</p> <p>12 Q. Do you remember who they were?</p> <p>13 A. Heather Demar, Rachel Mauer.</p> <p>14 Q. Let's go slow on that:</p> <p>15 D-e-m-a-r?</p> <p>16 A. Correct.</p> <p>17 Q. Rachel who?</p> <p>18 A. Mauer.</p> <p>19 Q. Anybody else?</p> <p>20 A. I don't believe so.</p> <p>21 Q. Were both of them on the</p> <p>22 basketball team?</p> <p>23 A. Yes.</p> <p>24 Q. And did that friendship with</p>	<p>1 Q. How did she tell you that?</p> <p>2 A. Through a text message.</p> <p>3 Q. Did she say by whom?</p> <p>4 A. No.</p> <p>5 Q. Did she say how old?</p> <p>6 A. I don't believe so.</p> <p>7 Q. Do you recall any details of</p> <p>8 what she put in the text messages to you</p> <p>9 about that?</p> <p>10 A. No.</p> <p>11 Q. Did you ever have a discussion</p> <p>12 with her about that in person as opposed</p> <p>13 to through text messages or some</p> <p>14 electronic means?</p> <p>15 A. No.</p> <p>16 Q. Did she ever say in the texts</p> <p>17 why she was telling you that?</p> <p>18 A. No.</p> <p>19 Q. Do you know if she told anybody</p> <p>20 else that?</p> <p>21 A. I don't know.</p> <p>22 Q. Let's talk about your senior</p> <p>23 year playing basketball. Was Eric Romig</p> <p>24 still the coach?</p>

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<p>1 A. Yes.</p> <p>2 Q. And the practices and whatever,</p> <p>3 did they begin in November of 2009?</p> <p>4 A. Yes.</p> <p>5 Q. Is it early November, late</p> <p>6 November? Do you remember?</p> <p>7 A. Early to mid.</p> <p>8 Q. Did you start dating Chase</p> <p>9 Brunner that year?</p> <p>10 A. Yes.</p> <p>11 Q. Do you recall when,</p> <p>12 approximately, you started dating him?</p> <p>13 A. November 20th.</p> <p>14 Q. You recall specifically when you</p> <p>15 started dating him.</p> <p>16 A. Yes.</p> <p>17 Q. Starting with that basketball</p> <p>18 season, November of 2009, did Eric Romig</p> <p>19 send you any text messages that were not</p> <p>20 basketball related?</p> <p>21 A. Yes.</p> <p>22 Q. When did he start sending them</p> <p>23 to you?</p> <p>24 A. Right when we started the</p>	<p>1 Q. She graduated a year before</p> <p>2 or...</p> <p>3 A. The year before anybody.</p> <p>4 Q. Was she on the basketball team?</p> <p>5 A. Yes.</p> <p>6 Q. In your junior year.</p> <p>7 A. No.</p> <p>8 Q. So, she had already graduated</p> <p>9 by then?</p> <p>10 A. Yes.</p> <p>11 Q. So, she was never attending the</p> <p>12 school while you were attending the</p> <p>13 school.</p> <p>14 A. No.</p> <p>15 Q. How did you know her?</p> <p>16 A. I had played against her when I</p> <p>17 went to Calvary.</p> <p>18 Q. In your senior year or in your</p> <p>19 junior year, while you were practicing for</p> <p>20 games at FCA, did she ever come to the</p> <p>21 gym?</p> <p>22 A. Yes.</p> <p>23 Q. On how many occasions?</p> <p>24 A. A handful.</p>
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<p>1 season.</p> <p>2 Q. And what topics or subjects was</p> <p>3 Mr. Romig texting you about at the</p> <p>4 beginning of the season? What type of</p> <p>5 text messages was he sending you that</p> <p>6 were not basketball related?</p> <p>7 A. Just about my physical features,</p> <p>8 that he liked me.</p> <p>9 Q. Anything else you can remember</p> <p>10 specifically?</p> <p>11 A. Specific text messages?</p> <p>12 Q. Yes, early in the season.</p> <p>13 We'll get to December in a second.</p> <p>14 A. Nothing I can recall early in</p> <p>15 the season.</p> <p>16 Q. At the start of that season</p> <p>17 were you acquainted with somebody named</p> <p>18 Laura Fretz?</p> <p>19 A. Lauren Fretz.</p> <p>20 Q. I'm sorry.</p> <p>21 A. Sorry.</p> <p>22 Q. That's okay. Fretz.</p> <p>23 A. I was not friends with her.</p> <p>24 She was not -- she had already graduated.</p>	<p>1 Q. What did she say when she got</p> <p>2 there?</p> <p>3 A. She just would scrimmage against</p> <p>4 us.</p> <p>5 Q. Did you know another student by</p> <p>6 the name of Kristen Kennedy?</p> <p>7 A. Yes.</p> <p>8 Q. How did you know her?</p> <p>9 A. I also played against her when</p> <p>10 I was at Calvary.</p> <p>11 Q. She was at FCA?</p> <p>12 A. Yes.</p> <p>13 Q. Did she graduate the same year</p> <p>14 as Lauren Fretz?</p> <p>15 A. Yes.</p> <p>16 Q. Did she also come to practices</p> <p>17 during your junior or senior years at</p> <p>18 FCA?</p> <p>19 A. Yes.</p> <p>20 Q. What did she do at practices?</p> <p>21 A. Same as Lauren: She would</p> <p>22 scrimmage against us.</p> <p>23 Q. Did any other players or any</p> <p>24 other people ever come to these practices</p>

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<p>1 your junior or senior year to scrimmage 2 with you other than those two? People 3 that had graduated. 4 A. Yes; I don't remember her name. 5 Q. One other person? 6 A. Yes. 7 Q. Do you know if these two 8 people, Lauren Fretz and Kristen Kennedy, 9 came to practices with Eric Romig -- in 10 other words, that he would drive them 11 there -- or did they come there on their 12 own? 13 A. I believe they came on their 14 own. 15 Q. Did Eric Romig ever text you 16 personal texts prior to the beginning of 17 basketball season in November of 2009? 18 A. No. 19 Q. How about in September or 20 October of that year? 21 A. I don't remember. 22 Q. You do remember him doing it 23 starting in November as soon as basketball 24 started, but you don't recall if he did</p>	<p>1 A. No. 2 Q. Did you ever text him about any 3 issues you were having with your 4 biological father? 5 A. No. 6 Q. Kevin Smith is your stepfather, 7 correct? 8 A. Yes. 9 Q. Did you ever send him a text 10 and indicate to him that you were wanting 11 to leave where you were living and go 12 live with your biological father? 13 A. No. 14 Q. Did you at some point live with 15 your biological father and then move in 16 with your stepfather and your mother? 17 Was there a period of time where you 18 lived with your biological father? 19 A. Not fully. I saw him on 20 weekends. 21 Q. The texts that you do recall 22 that Mr. Romig sent you in November or 23 any time prior to December of 2009, were 24 they generally personal in nature, having</p>
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<p>1 it before then. 2 A. Correct. 3 Q. Did he ever text you in 4 November or in any month prior to 5 December of 2009 texts about your family 6 or texts about your boyfriend? 7 A. Not about my family, but he 8 would mention that he didn't like my 9 boyfriend. 10 Q. In the texts he would say that. 11 A. Yes. 12 Q. What type of things would he 13 say? 14 A. He just said "I don't like you 15 with him." 16 Q. Did he say why? 17 A. Because he wanted me to be with 18 him. 19 Q. Did you ever text him about any 20 issues you were having with your parents? 21 A. No. 22 Q. Did you ever text him about any 23 issues you were having with your 24 boyfriend?</p>	<p>1 something to do with you and he getting 2 together somehow? 3 A. Yes. 4 Q. When those texts started 5 happening, did you notify or report those 6 texts to anybody at first? 7 A. No. 8 Q. Did you tell your parents? 9 A. No. 10 Q. Any of your friends? 11 A. No. 12 Q. Your boyfriend? 13 A. No. 14 Q. Chase? I'm talking about in 15 November. 16 A. Oh, yes. He became aware of 17 it. 18 Q. How did he become aware? 19 A. One evening we were together 20 and I had told him about it because Mr. 21 Romig was texting me. 22 Q. Do you remember where you were 23 you told Chase Brunner about the texts? 24 A. I believe we were in a car on</p>

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<p>1 our way home.</p> <p>2 Q. And did you get a text from</p> <p>3 Mr. Romig while you were in the car going</p> <p>4 home?</p> <p>5 A. Yes.</p> <p>6 Q. What did you tell Chase at that</p> <p>7 time? What did you tell him had been</p> <p>8 going on?</p> <p>9 A. I told him that Mr. Romig had</p> <p>10 been texting me more than just basketball</p> <p>11 and it was inappropriate. I had asked</p> <p>12 him not to say anything because his</p> <p>13 daughter was my best friend.</p> <p>14 Q. You're talking about Chelsea.</p> <p>15 A. Yes.</p> <p>16 Q. So, you asked Chase not to say</p> <p>17 anything to anybody else.</p> <p>18 A. Yes.</p> <p>19 Q. Did you tell Chase Brunner what</p> <p>20 type of texts you were receiving from Mr.</p> <p>21 Romig?</p> <p>22 A. Yes.</p> <p>23 Q. What did you tell him?</p> <p>24 A. I just told him that they were</p>	<p>1 with Chelsea.</p> <p>2 Q. Did you ever tell Chelsea about</p> <p>3 it?</p> <p>4 A. No.</p> <p>5 Q. Up to this point was Chase</p> <p>6 Brunner the first one who knew about</p> <p>7 these texts?</p> <p>8 A. Yes.</p> <p>9 Q. Was he the only person who had</p> <p>10 seen some of them other than yourself?</p> <p>11 A. Yes.</p> <p>12 Q. Did you continue to delete the</p> <p>13 texts from Mr. Romig after you received</p> <p>14 them?</p> <p>15 A. Yes.</p> <p>16 Q. At some point did you tell any</p> <p>17 of your other friends in high school or</p> <p>18 outside of high school about the texts</p> <p>19 that you were receiving from Mr. Romig?</p> <p>20 A. Yes.</p> <p>21 Q. Who did you talk to?</p> <p>22 A. Alli Alderfer.</p> <p>23 Q. Okay.</p> <p>24 A. And Fatcem Diabetes.</p>
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<p>1 inappropriate.</p> <p>2 Q. Did you tell him in what way</p> <p>3 they were inappropriate?</p> <p>4 A. Yes.</p> <p>5 Q. What did you tell him?</p> <p>6 A. They were sexual texts. They</p> <p>7 were inappropriate.</p> <p>8 Q. Did he ask to see them?</p> <p>9 A. I normally deleted them before,</p> <p>10 but he had seen a few. I don't remember</p> <p>11 which he had seen.</p> <p>12 Q. What was his reaction when he</p> <p>13 saw the texts and you told him about the</p> <p>14 texts?</p> <p>15 A. He was angry.</p> <p>16 Q. What did he want to do?</p> <p>17 A. He wanted to let Mr. Romig know</p> <p>18 that he knew what was going on.</p> <p>19 Q. Did you have a discussion about</p> <p>20 that?</p> <p>21 A. Yes.</p> <p>22 Q. What was the discussion?</p> <p>23 A. I just continued to ask him not</p> <p>24 to say anything because of my friendship</p>	<p>1 Q. Were they basketball players?</p> <p>2 A. No.</p> <p>3 Q. Were they classmates of yours?</p> <p>4 A. Yes.</p> <p>5 Q. Did you tell them together or</p> <p>6 separately?</p> <p>7 A. Together.</p> <p>8 Q. Do you remember where you were</p> <p>9 when you told them?</p> <p>10 A. Standing outside the gym.</p> <p>11 Q. Do you recall approximately when</p> <p>12 you told them, what month? Was this</p> <p>13 November or December?</p> <p>14 A. I believe November, very late</p> <p>15 November.</p> <p>16 Q. And as specifically as you can</p> <p>17 recall, what did you tell them?</p> <p>18 A. I just told them that my</p> <p>19 basketball coach had been texting me</p> <p>20 inappropriately.</p> <p>21 Q. Did you tell them what the</p> <p>22 subject of the texts was?</p> <p>23 A. No.</p> <p>24 Q. Did you tell them that some of</p>

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<p>1 the texts were sexual-based texts?</p> <p>2 A. Yes.</p> <p>3 Q. But you didn't give any</p> <p>4 specific details about the type of texts</p> <p>5 he was sending you.</p> <p>6 A. No.</p> <p>7 Q. What was their reaction?</p> <p>8 A. They were shocked.</p> <p>9 Q. Did they advise you to do</p> <p>10 anything?</p> <p>11 A. Yes.</p> <p>12 Q. What?</p> <p>13 A. They told me that I should tell</p> <p>14 the principal.</p> <p>15 Q. Did you do that?</p> <p>16 A. No.</p> <p>17 Q. For the same reason that you</p> <p>18 told Chase not to tell anyone?</p> <p>19 A. Correct.</p> <p>20 Q. Did you tell them not to tell</p> <p>21 anybody?</p> <p>22 A. Correct.</p> <p>23 Q. Do you know if they told</p> <p>24 anybody else?</p>	<p>1 A. I believe she lived with her</p> <p>2 grandmother in Sellersville.</p> <p>3 Q. Who was your homeroom teacher</p> <p>4 back in 2009?</p> <p>5 A. Kathy Tatarro.</p> <p>6 Q. And when you came into your</p> <p>7 homeroom in the morning at the start of</p> <p>8 school, was Cheryl Alderfer usually in the</p> <p>9 homeroom, also?</p> <p>10 A. Yes.</p> <p>11 Q. What kind of function did she</p> <p>12 perform?</p> <p>13 A. I'm not sure. I think she</p> <p>14 just kind of was helping with grading</p> <p>15 papers and -- I know she helped out in</p> <p>16 the lunchroom.</p> <p>17 Q. How did she help out in the</p> <p>18 lunchroom?</p> <p>19 A. Preparing the food.</p> <p>20 Q. Did you know her outside of</p> <p>21 school, Cheryl Alderfer, by going over to</p> <p>22 Alli's house on occasion?</p> <p>23 A. I had been there for a few</p> <p>24 things that we did as a class, but</p>
Page 39	Page 41
<p>1 A. I don't believe so.</p> <p>2 Q. When I'm ask asking that</p> <p>3 question, I'm referring to any other</p> <p>4 students.</p> <p>5 A. I don't think so.</p> <p>6 Q. It never came back to you? You</p> <p>7 never heard through any source that they</p> <p>8 had mentioned it to somebody else?</p> <p>9 A. No.</p> <p>10 Q. What's Alli's mother's name?</p> <p>11 A. Cheryl.</p> <p>12 Q. Did you know her?</p> <p>13 A. I did.</p> <p>14 Q. Was she something other than</p> <p>15 Alli's mother? Was she something at the</p> <p>16 school?</p> <p>17 A. She was my homeroom teacher's</p> <p>18 assistant.</p> <p>19 Q. Was Fateem Diabetes living with</p> <p>20 the Alderfer family?</p> <p>21 A. No.</p> <p>22 Q. Was she an exchange student, or</p> <p>23 was she living with a host family, or was</p> <p>24 she from the area?</p>	<p>1 nothing outside of that.</p> <p>2 Q. At the Alderfer house?</p> <p>3 A. Correct.</p> <p>4 Q. What type of class things?</p> <p>5 A. Dinners, those sorts of things.</p> <p>6 Q. When you're talking about class,</p> <p>7 you're talking about your grade class?</p> <p>8 A. Yes.</p> <p>9 Q. How many kids were in that</p> <p>10 class, approximately?</p> <p>11 A. Thirty.</p> <p>12 Q. Thirty? Okay. Did you find out</p> <p>13 at some point that Cheryl Alderfer had</p> <p>14 gotten some information about this texting</p> <p>15 issue between you and Eric Romig?</p> <p>16 A. Yes.</p> <p>17 Q. Do you recall when that was?</p> <p>18 A. Sometime in December.</p> <p>19 Q. Of 2009?</p> <p>20 A. Correct.</p> <p>21 Q. Do you know how she found out?</p> <p>22 A. She overheard her daughter Alli</p> <p>23 and Fateem talking about it at their</p> <p>24 house.</p>

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<p>1 Q. Did she tell you that? Did Cheryl Alderfer tell that you?</p> <p>2 A. Yes.</p> <p>3 Q. Where did she tell you that?</p> <p>4 A. Right outside of homeroom.</p> <p>5 Q. What time of day was this?</p> <p>6 A. In the morning.</p> <p>7 Q. When you first arrived at school?</p> <p>8 A. Shortly after.</p> <p>9 Q. And what exactly did she tell you she had overheard?</p> <p>10 A. She said "I know what's going on between you and Mr. Romig. I overheard Alli and Fateem talking about it" and brought me to Mr. Clymer's office.</p> <p>11 Q. When you say she brought you to Mr. Clymer's office, did she physically walk with you to Ryan Clymer's office?</p> <p>12 A. Yes.</p> <p>13 Q. Did she give you a choice?</p> <p>14 A. No.</p> <p>15 Q. Did she ask you to bring your</p>	<p>1 A. I don't recall a lot of what I sent back to him.</p> <p>2 Q. Aside from the sexually-based inappropriate emails, do you recall in December of 2009 texting back and forth with Mr. Romig regarding, again, issues you may be having at school, issues you might be having with your parents, or issues you might be having with your boyfriend?</p> <p>3 A. No.</p> <p>4 Q. Or just facts having nothing to do with school or basketball?</p> <p>5 A. No.</p> <p>6 Q. Before Mrs. Alderfer took you to Ryan Clymer's office, did she ask you for any details about what was going on?</p> <p>7 In other words, I'm asking you, after she told you she overheard a discussion between her daughter and Fateem Diabetes about the issue, did she ask you for any more details herself?</p> <p>8 A. No.</p> <p>9 Q. Did you give her any more</p>
Page 43	Page 45
<p>1 cell phone with you?</p> <p>2 A. I don't believe so.</p> <p>3 Q. Did you have your cell phone with you?</p> <p>4 A. I don't remember.</p> <p>5 Q. Did you usually take it to school?</p> <p>6 A. I kept it in my locker because of the amount of texts that he would send me.</p> <p>7 Q. During a school day?</p> <p>8 A. Yes.</p> <p>9 Q. "He" being Mr. Romig.</p> <p>10 A. Yes.</p> <p>11 Q. Did you return his texts?</p> <p>12 A. Yes.</p> <p>13 Q. Did you return every text?</p> <p>14 A. No.</p> <p>15 Q. What types of things would you text him back when he was texting you these inappropriate emails?</p> <p>16 A. I would not answer him mostly if it was inappropriate.</p> <p>17 Q. Okay.</p>	<p>1 details yourself?</p> <p>2 A. No.</p> <p>3 Q. Did you try to dissuade her from taking you to the headmaster's office to discuss it?</p> <p>4 A. No.</p> <p>5 Q. When she took you to Mr. Clymer's office, was he in the office?</p> <p>6 A. Yes.</p> <p>7 Q. Was anybody else in the office with him?</p> <p>8 A. No.</p> <p>9 Q. Did Cheryl Alderfer accompany you into the office with him?</p> <p>10 A. Yes.</p> <p>11 Q. And did you have a meeting with Mr. Clymer at that point?</p> <p>12 A. Yes.</p> <p>13 Q. Was it just you, Mr. Clymer and Cheryl Alderfer?</p> <p>14 A. Yes.</p> <p>15 Q. And did Cheryl Alderfer stay at the meeting throughout the entire course of the meeting?</p>

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<p>1 A. Yes.</p> <p>2 Q. From beginning to end?</p> <p>3 A. Yes.</p> <p>4 Q. When you got into the office</p> <p>5 with Mr. Clymer, what did Ms. Alderfer</p> <p>6 say, if anything?</p> <p>7 A. I believe she just said "Emily</p> <p>8 needs to make you aware of something</p> <p>9 that's going on."</p> <p>10 Q. And what did you tell Mr.</p> <p>11 Clymer, to the best of your recollection?</p> <p>12 A. From what I recall, I told him</p> <p>13 that my basketball coach, Mr. Romig, had</p> <p>14 been texting me inappropriately for a</p> <p>15 number of weeks now.</p> <p>16 Q. Did you tell him the type of</p> <p>17 texts?</p> <p>18 A. I believe I told him that they</p> <p>19 were inappropriate texts.</p> <p>20 Q. Did you say they were sexually</p> <p>21 inappropriate texts?</p> <p>22 A. I don't recall.</p> <p>23 Q. When you started telling Mr.</p> <p>24 Clymer about these texts and whatever,</p>	<p>1 of the texts that Mr. Romig was sending</p> <p>2 to you?</p> <p>3 A. No.</p> <p>4 Q. Did he ask you whether or not</p> <p>5 you had shared this information about the</p> <p>6 texting with anybody other than Alli</p> <p>7 Alderfer or Fateem Diabetes?</p> <p>8 A. I don't believe so.</p> <p>9 Q. Did he know that you were</p> <p>10 dating Chase Brunner at the time?</p> <p>11 A. Yes.</p> <p>12 Q. Did he ask you whether or not</p> <p>13 Chase Brunner knew of or had seen any of</p> <p>14 these inappropriate sexually-based texts?</p> <p>15 A. No, not during that meeting.</p> <p>16 Q. Did you have any other meeting</p> <p>17 with Mr. Clymer?</p> <p>18 A. No.</p> <p>19 Q. At any time after this first</p> <p>20 meeting with him -- and by the way, do</p> <p>21 you remember the date of that meeting?</p> <p>22 A. I only remember that it was</p> <p>23 right before being dismissed for Christmas</p> <p>24 break because I wasn't allowed back.</p>
Page 47	Page 49
<p>1 were you embarrassed?</p> <p>2 A. Yes.</p> <p>3 Q. Were you nervous?</p> <p>4 A. Yes.</p> <p>5 Q. Did you believe that something</p> <p>6 might happen to you?</p> <p>7 A. Yes.</p> <p>8 Q. Were you concerned that people</p> <p>9 might not believe you?</p> <p>10 A. Yes.</p> <p>11 Q. At that point did you have any</p> <p>12 undeleted texts on your phone that you</p> <p>13 know of?</p> <p>14 A. I don't recall.</p> <p>15 Q. During the course of the</p> <p>16 meeting did Mr. Clymer ask you to get</p> <p>17 your phone and bring it to him to look</p> <p>18 at?</p> <p>19 A. No.</p> <p>20 Q. Did anybody ever ask you to</p> <p>21 look at your phone?</p> <p>22 A. No.</p> <p>23 Q. Did Mr. Clymer ask you any</p> <p>24 questions about the inappropriate nature</p>	<p>1 Q. We'll get to that in second,</p> <p>2 but you think it was sometime within a</p> <p>3 week --</p> <p>4 A. About the 20th?</p> <p>5 Q. Yes, the week before the</p> <p>6 Christmas break.</p> <p>7 A. Correct.</p> <p>8 Q. Did Ryan Clymer ask you if your</p> <p>9 parents knew about this?</p> <p>10 A. No.</p> <p>11 Q. Do you recall him asking you</p> <p>12 any questions at all?</p> <p>13 A. No.</p> <p>14 Q. How long did the meeting last?</p> <p>15 A. Less than ten minutes.</p> <p>16 Q. During the meeting did Cheryl</p> <p>17 Alderfer say anything other than what you</p> <p>18 stated she said to open up the meeting?</p> <p>19 A. No.</p> <p>20 Q. What did Mr. Clymer say to you?</p> <p>21 A. He asked me to leave the school</p> <p>22 immediately.</p> <p>23 Q. Did he tell you why?</p> <p>24 A. Just for my safety.</p>

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<p>1 Q. Did he state to you why he 2 thought you might not be safe if you 3 stayed?</p> <p>4 A. No.</p> <p>5 Q. Did you argue with him about 6 that?</p> <p>7 A. No.</p> <p>8 Q. Did you ask him when you would 9 be allowed back in school?</p> <p>10 A. No.</p> <p>11 Q. Did he tell you when you would 12 be allowed back in school?</p> <p>13 A. No.</p> <p>14 Q. Did he tell you whether or not 15 he was going to do anything about the 16 information you gave him about the texting 17 from Mr. Romig?</p> <p>18 A. I believe he said he would 19 handle it.</p> <p>20 Q. Did he say any specifics about 21 how he would handle it?</p> <p>22 A. No.</p> <p>23 Q. When Ryan Clymer told you to 24 leave school immediately for your own</p>	<p>1 Q. Did he tell you that he would 2 instruct Mr. Romig not to have any 3 contact with you?</p> <p>4 A. No.</p> <p>5 Q. Do you know if there were any 6 more practices or games scheduled for the 7 basketball team prior to the Christmas 8 break?</p> <p>9 A. There were.</p> <p>10 Q. Was there a game or a practice 11 that same day that you went in to talk 12 to Ryan Clymer?</p> <p>13 A. There was a practice.</p> <p>14 Q. Did you go to that practice?</p> <p>15 A. No.</p> <p>16 Q. Did Ryan Clymer tell you 17 whether or not you were allowed to 18 participate in any basketball activities?</p> <p>19 A. He told me I was not allowed.</p> <p>20 Q. To do what?</p> <p>21 A. To participate in basketball.</p> <p>22 Q. When he told you that or when 23 he told you to go home and tell your 24 parents, did you argue with him at all?</p>
Page 51	Page 53
<p>1 safety, did he tell you what he wanted 2 you to do when you left school? Did he 3 give you some instruction about what to 4 do or not to do?</p> <p>5 A. He told me to go home and tell 6 my parents what was going on.</p> <p>7 Q. And as of that time your 8 parents didn't know what was going on.</p> <p>9 A. No.</p> <p>10 Q. Did you tell him that your 11 parents didn't know what was going on?</p> <p>12 A. Yes.</p> <p>13 Q. Did he give you any -- did 14 Ryan Clymer give you any other 15 instructions or directions about what you 16 were to do while he was handling this?</p> <p>17 A. No.</p> <p>18 Q. Did he tell you not to have 19 any contact with Eric Romig?</p> <p>20 A. No.</p> <p>21 Q. Did he tell what to do if you 22 received any additional inappropriate texts 23 from Eric Romig?</p> <p>24 A. No.</p>	<p>1 A. No.</p> <p>2 Q. About anything.</p> <p>3 A. No.</p> <p>4 Q. Do you know if there was a 5 basketball game before the Christmas 6 break?</p> <p>7 A. There was.</p> <p>8 Q. Do you know what team you were 9 playing?</p> <p>10 A. No.</p> <p>11 Q. Did you attempt to go to the 12 practice or play in that game?</p> <p>13 A. No.</p> <p>14 Q. Between the day that you met 15 with Mr. Clymer and the day that you 16 eventually came back to school, did you 17 have any contact with Eric Romig at all?</p> <p>18 A. No.</p> <p>19 Q. Did he just stop texting you 20 all of a sudden?</p> <p>21 A. He had sent me one text message 22 that was very random. My parents had my 23 phone at that time, so they kind of 24 handled it.</p>

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<p>1 Q. Do you know what that message 2 said?</p> <p>3 A. I don't recall. I know my 4 parents have it documented.</p> <p>5 Q. That was the only text message 6 you got from him?</p> <p>7 A. Yes.</p> <p>8 Q. Do you remember what day you 9 went back to school?</p> <p>10 A. It was after the Christmas 11 break, so...</p> <p>12 Q. Sometime in January 2010?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know if you went back 15 to school on the first school day after 16 the Christmas break?</p> <p>17 A. Yes.</p> <p>18 Q. Do you recall how you were 19 notified that you were allowed or 20 permitted to come back to school?</p> <p>21 A. I don't recall.</p> <p>22 Q. Do you recall yourself getting 23 any message from Ryan Clymer or any of 24 the administration at FCA, or your parents</p>	<p>1 the discussion you had with Mr. Clymer?</p> <p>2 A. I told them that my basketball 3 coach was texting me inappropriately, and 4 I was contacted by Cheryl Alderfer to go 5 and tell Mr. Clymer about this.</p> <p>6 Q. Did you tell them anything 7 about the type of texts you were getting 8 from Mr. Romig?</p> <p>9 A. Yes.</p> <p>10 Q. What did you tell them?</p> <p>11 A. I told them they were sexual, 12 inappropriate.</p> <p>13 Q. Did you give them any idea 14 about the quantity of texts that you were 15 receiving from Mr. Romig?</p> <p>16 A. I don't recall.</p> <p>17 Q. Did you tell them how long this 18 had been going on?</p> <p>19 A. Yes.</p> <p>20 Q. Do you remember what you told 21 them, for how many weeks or months or 22 whatever?</p> <p>23 A. I told them I believe about two 24 months.</p>
Page 55	Page 57
<p>1 getting any information or message from 2 FCA?</p> <p>3 A. No.</p> <p>4 Q. What did you do after the 5 meeting with Mr. Clymer?</p> <p>6 A. Drove home and told my parents 7 what was going on.</p> <p>8 Q. Did you go to your locker 9 first?</p> <p>10 A. I don't recall.</p> <p>11 Q. Did you get your cell phone?</p> <p>12 A. Probably.</p> <p>13 Q. You don't have a recollection 14 of doing it, but when you got home did 15 you have your cell phone?</p> <p>16 A. Yes.</p> <p>17 Q. Where were your parents when 18 you got home?</p> <p>19 A. They were both working from 20 home, so they had been there.</p> <p>21 Q. And tell me how that 22 conversation went with your parents what 23 did you tell them. What did you tell 24 them about why you were home and about</p>	<p>1 Q. Did your parents ask you any 2 questions?</p> <p>3 A. They just instructed me to sit 4 down with them and type out everything I 5 could remember.</p> <p>6 Q. About what?</p> <p>7 A. About what he was sending me.</p> <p>8 Q. About the texts that Mr. Romig 9 was sending you.</p> <p>10 A. Yes.</p> <p>11 Q. The inappropriate texts that he 12 was sending you.</p> <p>13 A. Yes.</p> <p>14 Q. And who gave you that 15 instruction?</p> <p>16 A. I believe my father, Kevin.</p> <p>17 Q. And did you sit down and type 18 something out regarding your recollection 19 of the type of inappropriate sexual texts 20 you were receiving from Mr. Romig?</p> <p>21 A. Yes.</p> <p>22 Q. I'm going to show you what's 23 previously been marked as Romig exhibit 24 six at his deposition. It's two pages:</p>

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<p>1 The first page is an email from your</p> <p>2 mother to Ryan Clymer dated December 31st,</p> <p>3 2009, at 11:27 a.m.; the second page is a</p> <p>4 typed document that has at the top "Emily</p> <p>5 Mayer Statements."</p> <p>6 I'll ask you to take a look at</p> <p>7 that and then tell me whether or not</p> <p>8 that's the document that you were just</p> <p>9 referring to in your testimony that you</p> <p>10 prepared at your parents' direction.</p> <p>11 A. Yes, this is the document.</p> <p>12 Q. Did your parents ask to see</p> <p>13 your phone?</p> <p>14 A. Yes.</p> <p>15 Q. At that time?</p> <p>16 A. Yes.</p> <p>17 Q. Did you give it to them?</p> <p>18 A. Yes.</p> <p>19 Q. At that time, other than that</p> <p>20 one email that you had mentioned was on</p> <p>21 there, were there any other -- strike</p> <p>22 that.</p> <p>23 Other than the one text that</p> <p>24 you had mentioned from Eric Romig, were</p>	<p>1 page?</p> <p>2 In other words, at a game,</p> <p>3 after a game, walking through the hallways</p> <p>4 at school or walking to a practice field</p> <p>5 or anything like that, did you ever talk</p> <p>6 about any of this stuff in person with</p> <p>7 him?</p> <p>8 A. Never face-to-face.</p> <p>9 Q. Not once.</p> <p>10 A. No.</p> <p>11 Q. So, the only information that</p> <p>12 you got from him was through texting.</p> <p>13 A. Yes.</p> <p>14 Q. Let me correct that. I think</p> <p>15 there was something -- strike that.</p> <p>16 In the text messages relating</p> <p>17 to this first entry on your statement</p> <p>18 page here, what types of things was he</p> <p>19 telling you that he and Lauren were doing</p> <p>20 or had done?</p> <p>21 A. That they were having or had</p> <p>22 sex.</p> <p>23 Q. Physical contact.</p> <p>24 A. Yes.</p>
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<p>1 there any other texts from him that had</p> <p>2 not been deleted from the phone?</p> <p>3 A. I don't believe there were any</p> <p>4 texts from him.</p> <p>5 Q. So, when you prepared the</p> <p>6 statements that are attached to Romig</p> <p>7 exhibit six, this was all done from your</p> <p>8 memory of texts that you had received</p> <p>9 from Eric Romig over the last month or</p> <p>10 two. Is that correct?</p> <p>11 A. Yes.</p> <p>12 Q. I'm going to ask you about some</p> <p>13 of these texts that are in here, in your</p> <p>14 statement. The first notation here is --</p> <p>15 sorry, quoting, "Beginning in November he</p> <p>16 started telling me how he and Lauren did</p> <p>17 sexual things and was hinting at me to be</p> <p>18 this way."</p> <p>19 When you put down Lauren's name</p> <p>20 here, were you referring to Lauren Fretz?</p> <p>21 A. Yes.</p> <p>22 Q. Did you ever have any direct</p> <p>23 conversations with Mr. Romig about any of</p> <p>24 the statements that you have down on this</p>	<p>1 Q. Prior to receiving that text</p> <p>2 from Mr. Romig, did you have any</p> <p>3 knowledge of or suspicion of or had you</p> <p>4 heard anything from any source that there</p> <p>5 was some type of relationship between</p> <p>6 Lauren Fretz and Eric Romig?</p> <p>7 A. No.</p> <p>8 Q. Nothing in the hallways or no</p> <p>9 suspicion you had when Lauren Fretz showed</p> <p>10 up for practice?</p> <p>11 A. No.</p> <p>12 Q. Nothing at all.</p> <p>13 A. No.</p> <p>14 Q. The fourth statement from the</p> <p>15 bottom you state, "He would forward text</p> <p>16 messages he said were between he and</p> <p>17 Lauren Fretz and asked if I was jealous."</p> <p>18 When you wrote here that he</p> <p>19 would forward text messages, did he</p> <p>20 forward you the actual text message that</p> <p>21 he had sent to Lauren Fretz or she had</p> <p>22 sent to him?</p> <p>23 MR. KEMETHER: Objection to the</p> <p>24 form.</p>

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<p>1 A. I don't recall. I know he 2 would forward text messages to me that 3 she had sent me, but I -- 4 Q. That she had sent who? 5 A. That she had sent him, I'm 6 sorry, but I don't recall what they said. 7 Q. Okay. But do you have a 8 recollection of seeing on your phone some 9 text message that was actually authored by 10 Lauren Fretz? 11 A. No. 12 Q. So, he would be telling you 13 about texts that he had had or received 14 from Lauren Fretz? 15 A. Yes. 16 Q. The second entry is "December 17 5th - Desales game he texted me and said 18 'I want to be in you.' 19 Again, you're writing this at 20 the end or toward the end of December. 21 How did you know that that text was 22 specifically sent on that date? 23 A. I believe I probably just 24 remembered that from having that on our</p>	<p>1 A. A van. 2 Q. A van. And how many people went 3 to the game? 4 A. Our whole team. 5 Q. Were they all in one van, or 6 was there more than one vehicle? 7 A. I don't recall. 8 Q. What was your response, if any, 9 when Mr. Romig sent you that text? 10 A. I did not respond. I deleted 11 it. 12 Q. Right then and there? 13 A. Yes. 14 Q. Did you move your seat? 15 A. No. The car was moving. 16 Q. And that day while you were at 17 the game, you went to this game, whatever 18 team you saw playing -- it was a college 19 game, correct? 20 A. Correct. 21 Q. (Continuing) -- did he mention 22 anything to you in person about the text 23 that he had sent you, about that specific 24 text?</p>
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<p>1 calendar because that's when we went to 2 the game. 3 Q. I think in Mr. Romig's 4 deposition he said that you had never 5 gone to a DeSales game, that you had gone 6 to a Drexel game. 7 Does that change your 8 recollection at all, whether it was 9 DeSales, Drexel or some other game? 10 A. I knew it was a school. As 11 far as the date, I don't recall. 12 Q. Do you know whether or not 13 Chase Brunner ever saw that text? 14 A. No. That was -- that text was 15 sent to me while we were on our way to 16 the game. 17 Q. Why don't you describe that for 18 us? What were the circumstance surrounding 19 the sending of that text? 20 A. We were on our way to the game 21 and he was sitting next to me, and he 22 had texted me that. 23 Q. What type of vehicle were you 24 going in?</p>	<p>1 A. No. 2 Q. The next entry is "This month 3 he would just tell me every day that he 4 was in love with me." By "this month," 5 the reference in that sentence, is that 6 to the month of December? 7 A. I believe so. 8 Q. The next statement: "He would 9 tell me he could give me everything that 10 I need and has so much to offer me and 11 wants to marry me." 12 Did he text you words or 13 statements to that effect on more than 14 one occasion? 15 A. Yes. 16 Q. Do you know how many? 17 A. No. 18 Q. Did you know whether or not he 19 was married at the time? 20 A. I did know that he was married 21 at the time. 22 Q. Did you ever meet his wife? 23 A. Yes. 24 Q. On what occasions?</p>

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<p>1 A. Games, when I was at his house.</p> <p>2 Q. Oh, that's right, when you</p> <p>3 stayed over with Chelsea, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Did Mr. Romig ever text you</p> <p>6 that he was having any problems with his</p> <p>7 wife?</p> <p>8 A. No.</p> <p>9 Q. Did he ever text you that he</p> <p>10 intended to divorce his wife?</p> <p>11 A. No.</p> <p>12 Q. The next statement states, "He</p> <p>13 wanted me to pick between him and Chase,</p> <p>14 said he hated my picture on my cell phone</p> <p>15 and told me to delete it."</p> <p>16 Do you know whether or not</p> <p>17 Chase Brunner ever saw that text?</p> <p>18 A. I don't recall.</p> <p>19 Q. Did you tell Chase at some</p> <p>20 point that you were getting that type of</p> <p>21 text from Mr. Romig?</p> <p>22 A. Yes.</p> <p>23 Q. And is that what made Chase</p> <p>24 upset?</p>	<p>1 jeans?</p> <p>2 A. He may have said that after he</p> <p>3 sent me the picture. When he initially</p> <p>4 sent me the picture there was nothing</p> <p>5 with it.</p> <p>6 Q. The next statement is "He told</p> <p>7 me he would leave the house just to text</p> <p>8 me because he had to hide it." How many</p> <p>9 times did he send you a text of that</p> <p>10 nature?</p> <p>11 A. Very frequently.</p> <p>12 Q. And the same type of statement,</p> <p>13 the next statement: "Coach said he</p> <p>14 stayed in his bathroom for long periods</p> <p>15 of time to text me."</p> <p>16 Was it your understanding or</p> <p>17 impression from the texts that you were</p> <p>18 getting Mr. Mr. Romig that he was hiding</p> <p>19 this from his wife?</p> <p>20 A. Yes.</p> <p>21 Q. Would you say that throughout</p> <p>22 this texting, the personal texting that</p> <p>23 Mr. Romig was sending you, that he was at</p> <p>24 some point, in some way, aside from the</p>
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<p>1 A. Yes.</p> <p>2 Q. Do you know what he meant by</p> <p>3 stating "Said he hated my picture on my</p> <p>4 cell phone and told me to delete it"?</p> <p>5 A. It was a picture of Chase and</p> <p>6 I.</p> <p>7 Q. On your cell phone.</p> <p>8 A. Yes.</p> <p>9 Q. And how would he have seen</p> <p>10 that?</p> <p>11 A. I don't know.</p> <p>12 Q. Did Mr. Romig ever send you any</p> <p>13 pictures?</p> <p>14 A. Yes.</p> <p>15 Q. How many?</p> <p>16 A. One.</p> <p>17 Q. What was the image of?</p> <p>18 A. Him in his new jeans.</p> <p>19 Q. Was there a text with it?</p> <p>20 A. I don't recall.</p> <p>21 Q. You don't recall if there was</p> <p>22 any text along with it?</p> <p>23 A. No.</p> <p>24 Q. How did you know they were new</p>	<p>1 sexually-based texting, trying to act as</p> <p>2 some kind of mentor to you?</p> <p>3 A. No.</p> <p>4 Q. Did you ever seek him out to</p> <p>5 be or to act as a mentor to you for</p> <p>6 personal issues or school issues, that</p> <p>7 type of thing?</p> <p>8 A. No.</p> <p>9 Q. Do you know if he did that for</p> <p>10 other players on his team?</p> <p>11 A. No.</p> <p>12 MR. SANTARONE: I'm sorry, no,</p> <p>13 you don't know; or no, he didn't?</p> <p>14 THE WITNESS: No, I don't</p> <p>15 recall if he had done that for anybody</p> <p>16 else.</p> <p>17 BY MR. GROTH:</p> <p>18 Q. No other player on the team had</p> <p>19 told you that he had been acting as her</p> <p>20 mentor in some way.</p> <p>21 A. No.</p> <p>22 Q. The next statement is "December</p> <p>23 17th - Coach texted me after the game,</p> <p>24 Just so you know next Tuesday I'm going</p>

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<p>1 to tell them that I resign. I said why 2 and he said that he can't be friends with 3 me and has to quit because it kills him 4 to see me." 5 How do you know that that text 6 was on December 17th? 7 A. I don't recall. 8 Q. Is there something about that 9 particular text that made the date stand 10 out in your memory for some reason? 11 A. It could have been that we had 12 a game that day and I remember the date 13 from our game. 14 Q. Do you remember what game you 15 were referring to, what team? 16 A. No. 17 Q. Did the team ever go to away 18 games on a bus, school bus? 19 A. Yes. 20 Q. Was there any time when girls 21 on the team would change their clothes 22 from their school clothes to their 23 basketball uniforms or back on the bus? 24 A. No.</p>	<p>1 A. If by "sexual" you mean like he 2 would just tell me that he wanted to be 3 with me. 4 Q. Yes. 5 A. Yes. 6 Q. Did you ever text him, telling 7 him to stop texting you? 8 A. I don't recall. 9 Q. Were you concerned at all that, 10 if you didn't accept his texts or tell 11 him to stop texting you or whatever, that 12 it might affect your ability to play on 13 the basketball team? 14 A. Yes. 15 Q. How did you rate yourself as a 16 player on the basketball team your senior 17 year? Were you one of the better 18 players, the best player, a substitution 19 player? Who? 20 A. I started. I don't think I 21 was the best player, but... 22 Q. Okay. Were you a captain or 23 co-captain of the team? 24 A. Yes.</p>
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<p>1 Q. The next statement says "Coach 2 told me he liked being on the Quakertown 3 school bus with his team because they 4 would change in front of him," and then 5 it says in parenthesis "(text message was 6 more recent)." 7 What did you mean by "text 8 message was more recent"? 9 A. That he had sent that text 10 message to me more recently from when I 11 was writing this. 12 Q. That would be toward the end of 13 December. 14 A. Yes. 15 Q. The next statement is "Late 16 night text messages unreturned by me 17 because I feel asleep" -- probably meant 18 "fell asleep." "He would respond with a 19 text full of" question marks. 20 How often would you get 21 late-night text messages from Mr. Romig? 22 A. Every night. 23 Q. And were those late-night text 24 messages usually of a sexual nature?</p>	<p>1 Q. Along with whom? 2 A. Chelsea Romig and Heather Demar. 3 Q. So, the three co-captains. 4 A. Yes. 5 Q. At any time before you had your 6 meeting with Ryan Clymer, did Eric Romig 7 demote the three of you or some of you 8 as co-captains from the team? 9 A. No. 10 Q. Was there ever a problem with 11 you having issues with other members of 12 the team where you were bad-mouthing them 13 or snapping at them or having fights with 14 them, anything of that nature at all? 15 A. No. 16 Q. Do you know how many games you 17 actually had played before Ryan Clymer 18 told you at that meeting to go home and 19 discontinue your basketball activities? 20 A. I don't recall. 21 Q. The season starts sometime in 22 November? 23 A. Yes. 24 Q. And did you usually have a game</p>

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<p>1 every week?</p> <p>2 A. Yes.</p> <p>3 Q. Does the actual season start</p> <p>4 later in November?</p> <p>5 A. I believe so.</p> <p>6 Q. You state that you did not have</p> <p>7 any further conversations with Ryan Clymer</p> <p>8 about the Eric Romig texting allegations,</p> <p>9 correct?</p> <p>10 A. Correct.</p> <p>11 Q. Did you have any conversations</p> <p>12 at any time with any other administrators</p> <p>13 at FCA?</p> <p>14 A. No.</p> <p>15 Q. Did you ever have any</p> <p>16 conversations with any of the pastors</p> <p>17 there at the church?</p> <p>18 A. No.</p> <p>19 Q. Did you have any conversations</p> <p>20 with Mr. Hollenbach, the athletic</p> <p>21 director?</p> <p>22 A. No.</p> <p>23 Q. He never asked you any</p> <p>24 questions about anything.</p>	<p>1 Q. Is it Jones?</p> <p>2 A. Yes.</p> <p>3 Q. Ron Jones?</p> <p>4 A. Yes.</p> <p>5 Q. You were going to meet with him</p> <p>6 where?</p> <p>7 A. In his office.</p> <p>8 Q. Is that at the school?</p> <p>9 A. It's at the school.</p> <p>10 Q. Okay.</p> <p>11 A. And I don't know if I got the</p> <p>12 time wrong or he was just not there. I</p> <p>13 happened to be sitting outside, and Mr.</p> <p>14 Hollenbach and Mr. Clymer were on the</p> <p>15 phone with Mr. Romig.</p> <p>16 Q. You were sitting outside where?</p> <p>17 A. Of Ron Jones' office.</p> <p>18 Q. Was the door to the office open</p> <p>19 or closed?</p> <p>20 A. Closed.</p> <p>21 Q. Was there anybody else outside</p> <p>22 the office with you?</p> <p>23 A. No.</p> <p>24 Q. What time of day was this?</p>
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<p>1 A. No.</p> <p>2 Q. Did you have any more</p> <p>3 discussions with Cheryl Alderfer?</p> <p>4 A. No.</p> <p>5 Q. After you went home and told</p> <p>6 your parents and wrote up this statement</p> <p>7 of inappropriate texts that you were</p> <p>8 receiving from Mr. Romig, would it be</p> <p>9 fair to say that your parents basically</p> <p>10 handled the situation from there on out?</p> <p>11 A. No.</p> <p>12 Q. Handled it in terms of dealing</p> <p>13 with the school, dealing with Ryan Clymer</p> <p>14 and...</p> <p>15 A. Yes, the best that they could.</p> <p>16 Q. Did you ever hear any</p> <p>17 conversations between Ryan Clymer, Mr.</p> <p>18 Hollenbach and Mr. Romig?</p> <p>19 A. Yes.</p> <p>20 Q. Tell me about that.</p> <p>21 A. I was going to meet with Pastor</p> <p>22 Ron --</p> <p>23 Q. What's his full name?</p> <p>24 A. I'm not...</p>	<p>1 A. Around lunchtime.</p> <p>2 Q. Is there a glass window or</p> <p>3 window pane or whatever into the office</p> <p>4 where you could see who was in the</p> <p>5 office?</p> <p>6 A. There is a small window, I</p> <p>7 believe, on the door.</p> <p>8 Q. On the door? Okay. When you</p> <p>9 got to the office, did you look inside to</p> <p>10 see who was inside?</p> <p>11 A. No.</p> <p>12 Q. But you could hear voices from</p> <p>13 outside?</p> <p>14 A. Yes.</p> <p>15 Q. This was after you came back to</p> <p>16 school, correct?</p> <p>17 A. Yes.</p> <p>18 Q. So, it would have been after</p> <p>19 the Christmas break.</p> <p>20 A. Yes.</p> <p>21 Q. And could you hear the voices</p> <p>22 talking in the room?</p> <p>23 A. Yes.</p> <p>24 Q. Did you recognize all of the</p>

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<p>1 voices?</p> <p>2 A. Yes.</p> <p>3 Q. You recognized Mr. Clymer's and</p> <p>4 Mr. Hollenbach's and Mr. Romig's voice?</p> <p>5 A. Yes.</p> <p>6 Q. Was Mr. Romig on the phone?</p> <p>7 A. Yes.</p> <p>8 Q. Was it a speakerphone setup?</p> <p>9 A. Yes.</p> <p>10 Q. And what did you hear them say</p> <p>11 or talk about?</p> <p>12 A. I don't recall most any of the</p> <p>13 conversation. They were just kind of going</p> <p>14 back and forth, and that's really all I</p> <p>15 remember.</p> <p>16 Q. Do you recall them talking at</p> <p>17 all about the allegations that you made</p> <p>18 about the texting and the inappropriate</p> <p>19 texts that you claim that he was sending</p> <p>20 you?</p> <p>21 A. I don't recall.</p> <p>22 Q. Were the voices loud? Did it</p> <p>23 sound like somebody was angry or upset?</p> <p>24 A. Yes.</p>	<p>1 Q. So, you just left after a</p> <p>2 period of time?</p> <p>3 A. Yes.</p> <p>4 Q. And again, there was nobody</p> <p>5 else sitting out at the outer-office area</p> <p>6 but you?</p> <p>7 A. No.</p> <p>8 Q. When you came back to school</p> <p>9 after the Christmas break, did you</p> <p>10 immediately resume your basketball</p> <p>11 activities?</p> <p>12 A. Yes.</p> <p>13 Q. Do you recall how you were</p> <p>14 informed that you could do so?</p> <p>15 A. No.</p> <p>16 Q. Was Eric Romig still coaching</p> <p>17 the team then?</p> <p>18 A. No.</p> <p>19 Q. Did you know what happened to</p> <p>20 him?</p> <p>21 A. No.</p> <p>22 Q. From any source: From your</p> <p>23 parents or from the school or anything at</p> <p>24 all. Did somebody tell you that he was</p>
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<p>1 Q. Who was angry or upset? Whose</p> <p>2 voice could you hear that sounded angry</p> <p>3 or upset?</p> <p>4 A. Mr. Romig.</p> <p>5 Q. Did you wait outside the office</p> <p>6 door until that telephone conversation was</p> <p>7 over?</p> <p>8 A. Yes.</p> <p>9 Q. Did Mr. Hollenbach and Mr.</p> <p>10 Clymer then come out the door, leave the</p> <p>11 office?</p> <p>12 A. Yes.</p> <p>13 Q. Did they see you?</p> <p>14 A. Yes.</p> <p>15 Q. Did they talk to you at all?</p> <p>16 A. No.</p> <p>17 Q. Did they ask you what you were</p> <p>18 doing there?</p> <p>19 A. No.</p> <p>20 Q. Did they ask you if you had</p> <p>21 heard any of the conversation?</p> <p>22 A. No.</p> <p>23 Q. Did Pastor Jones ever show up?</p> <p>24 A. No.</p>	<p>1 not going to be the coach any more?</p> <p>2 A. I knew that he was not going</p> <p>3 to be there. I don't recall how.</p> <p>4 Q. You don't recall if it was your</p> <p>5 parents or somebody else told you that?</p> <p>6 A. No.</p> <p>7 Q. Who took over coaching the</p> <p>8 team?</p> <p>9 A. Mr. Forker.</p> <p>10 Q. Was he another coach of another</p> <p>11 team at the school?</p> <p>12 A. The mens.</p> <p>13 Q. Did he coach Chase Brunner?</p> <p>14 A. Yes.</p> <p>15 Q. When you got back to the team</p> <p>16 and started playing again, did any of</p> <p>17 your teammates ask you any questions about</p> <p>18 what was going on and why Mr. Romig was</p> <p>19 not coaching the team any more?</p> <p>20 A. No one really talked to me.</p> <p>21 Q. Did you get an impression from</p> <p>22 anything anybody said or did that they</p> <p>23 knew that there was some issue between</p> <p>24 you and Mr. Romig?</p>

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<p>1 A. Yes.</p> <p>2 MR. KEMETHER: Objection to the</p> <p>3 form.</p> <p>4 Q. Did you ever speak to Chelsea</p> <p>5 Romig about the allegations about improper</p> <p>6 sexual texting by her father?</p> <p>7 A. Yes.</p> <p>8 Q. Tell me about that.</p> <p>9 A. One of our assistant coaches</p> <p>10 had asked Chelsea and I to sit down</p> <p>11 together in a classroom and try to work</p> <p>12 through things, but neither of us really</p> <p>13 talked.</p> <p>14 Q. And who was that coach?</p> <p>15 A. I believe it was Mrs. Landis.</p> <p>16 Q. That's Robin Landis?</p> <p>17 A. Yes.</p> <p>18 Q. Did Chelsea Romig ever call you</p> <p>19 after your meeting with Ryan Clymer?</p> <p>20 A. Yes.</p> <p>21 Q. On your cell phone?</p> <p>22 A. Yes.</p> <p>23 Q. Did you take the call?</p> <p>24 A. I did.</p>	<p>1 A. That I was sorry for what had</p> <p>2 happened. I don't recall much other</p> <p>3 than...</p> <p>4 Q. Do you recall anything that she</p> <p>5 said?</p> <p>6 A. No.</p> <p>7 Q. Do you recall whether or not</p> <p>8 she said that she believed your</p> <p>9 accusations about her father?</p> <p>10 A. No.</p> <p>11 Q. She didn't say one way or the</p> <p>12 other, whether she believed or did not</p> <p>13 believe them.</p> <p>14 A. No.</p> <p>15 Q. How did the rest of the</p> <p>16 basketball season go once you rejoined the</p> <p>17 team?</p> <p>18 A. Not good.</p> <p>19 Q. In what way?</p> <p>20 A. Didn't pass me the ball,</p> <p>21 unkind.</p> <p>22 Q. The other girls?</p> <p>23 A. Yes.</p> <p>24 Q. Did any of them say anything to</p>
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<p>1 Q. And what was said?</p> <p>2 A. I had answered the call and she</p> <p>3 asked what was going on between me and</p> <p>4 her father, and I hung up.</p> <p>5 Q. Why did you hang up?</p> <p>6 A. Because I didn't know what to</p> <p>7 say to her.</p> <p>8 Q. Did she ever call you back?</p> <p>9 A. No.</p> <p>10 Q. Did you ever have any phone</p> <p>11 conversation with her about the texts from</p> <p>12 her father to you?</p> <p>13 A. No.</p> <p>14 Q. You said Robin Landis put you</p> <p>15 in a room with her when you came back to</p> <p>16 rejoin the basketball team after the</p> <p>17 Christmas break.</p> <p>18 Did you have any discussion</p> <p>19 with her at all in the room, or did you</p> <p>20 just pretty much sit and stare at each</p> <p>21 other?</p> <p>22 A. I think it was more of me</p> <p>23 apologizing.</p> <p>24 Q. Saying what?</p>	<p>1 you at all about the issue between you</p> <p>2 and Mr. Romig?</p> <p>3 A. No.</p> <p>4 Q. Did you finish out the</p> <p>5 basketball season?</p> <p>6 A. Yes.</p> <p>7 Q. When you started up playing</p> <p>8 basketball again after the Christmas break</p> <p>9 in January of 2010, was Mr. Romig allowed</p> <p>10 to watch the games?</p> <p>11 A. Yes.</p> <p>12 Q. Did he sit with the team?</p> <p>13 A. Yes.</p> <p>14 Q. This is for home games, right?</p> <p>15 A. Yes.</p> <p>16 Q. Did the team sit on separate</p> <p>17 benches or separate rows or separate</p> <p>18 chairs on the basketball floor?</p> <p>19 A. Chairs.</p> <p>20 Q. On individual chairs lined up?</p> <p>21 A. Yes.</p> <p>22 Q. Were other spectators allowed to</p> <p>23 sit in those chairs other than people on</p> <p>24 the team?</p>